

Re: Fw: Draft Fact Sheet and Permit Language for Wind River Produced Water Discharges

Elaine Lai to: lai.elaine

08/02/2012 11:10 AM

From: Elaine Lai/R8/USEPA/US

To: lai.elaine@EPA.GOV

Dear Elaine, I assume with an allowance of TDS that high you are only concerned about cows. In order to identify a hazard (s) you need to require WET testing. Especially every time there is any well treatment fluid or workover fluid in the discharge. I am discovering that treatments like biocides and dispersants are being used commonly for maintenance above and beyond what is used during drilling or fracking. You might consider asking that specific chemicals be monitored such as DBNPA, MTBE, benzene, for example. There does not seem to be anything specific about how much a chemical can exceed "the normal level".

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